

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

UNITED STATES OF AMERICA	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	CASE NO. 7:08-CV-302
	§	(Consolidated)
0.094 ACRES OF LAND, MORE OR LESS,	§	
SITUATE IN HIDALGO COUNTY, TEXAS;	§	
AND EDIBERTO B. REYNA, JR., ET AL.	§	
<i>Defendant.</i>	§	

**JOINT NOTICE OF SETTLEMENT IN PRINCIPLE BETWEEN
THE UNITED STATES OF AMERICA AND PAMELA RIVAS**

1. Pursuant to Local Rule 16.3, Defendant, Pamela Rivas (“Ms. Rivas”) and Plaintiff, the United States of America (collectively, “the Parties”), file this joint notice of the Parties’ forthcoming settlement agreement.

2. The United States and Ms. Rivas have reached a comprehensive settlement in principle that, once finalized, will resolve this matter entirely regarding the unresolved tracts in this case—to wit: Tracts RGV-MCS-1004 (fee), 1004E-1 (perpetual easement), 1004E-2 (temporary easement), 1004E-3 (temporary easement), and 1005-2 (fee) (hereinafter, “**2008 Takings**”); and Tracts RGV-MCS-1107 (fee), 1108 (fee), 1108-2 (fee), and 1108-3 (fee) (hereinafter, “**2020 Takings**”).

3. The Parties are in the process of finalizing revestment language and compensation amount that will require approval from U.S. Customs and Border Protection, the Department of Homeland Security, and the Department of Justice. Counsel are currently preparing the settlement paperwork to submit through this approval process.

4. Upon finalizing the Parties’ settlement agreement, the Parties will file a joint stipulation to settlement and revestment, detailing the terms of the Parties’ agreement and

requesting that the Court enter an order of revestment and dismissal in accordance with those terms.

Respectfully submitted,

FOR DEFENDANT

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was sent to all counsel of record via the court enabled electronic filing system on September 1, 2021.

s/ Christopher D. Pineda

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